

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

JAMERIAL BENSON

PLAINTIFF

v.

CIVIL ACTION NO.: 2023-0068

HIGHER EDUCATION LOAN
AUTHORITY OF THE STATE OF
MISSOURI d/b/a MOHELA;
NAVIENT CORPORATION;
CONDUENT EDUCATION SERVICES, LLC
f/k/a ACS EDUCATION SERVICES, INC.

DEFENDANTS

PLAINTIFF'S RESPONSES TO NAVIENT CORPORATION'S
FIRST SET OF REQUESTS FOR ADMISSIONS

Pursuant to Miss. R. Civ. P. 36(a), Plaintiff Jamerial Benson responds to Navient Corporation's First Set of Requests for Admissions as follows:

REQUEST NO. 1: Admit that you are not seeking damages exceeding \$75,000, exclusive of interests and costs, in this case.

RESPONSE: Denied.

REQUEST NO. 2: If you denied Request for Admission No. 1, admit that you will ask a judge or jury for damages in excess of \$75,000.

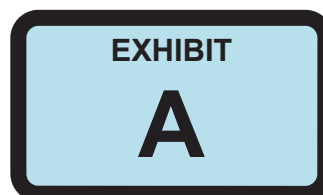
RESPONSE: Admitted.

REQUEST NO. 3: If you denied Request for Admission No. 1, admit that you will not accept a total sum greater than \$75,000 for any damages, even if awarded by a jury.

RESPONSE: Denied.

REQUEST NO. 4: If you denied Request for Admission No. 1, admit that if awarded a total sum greater than \$75,000 by a judge or jury, you will not execute on any portion of the judgment that exceeds \$75,000.

RESPONSE: Denied.



REQUEST NO. 5: If you denied Request for Admission No. 1, admit that in the event of a verdict of greater than \$75,000, you and your attorneys agree that any such judgment will be satisfied and canceled upon payment of \$75,000.

RESPONSE: Denied.

REQUEST NO. 6: If you denied Request for Admission No. 1, admit that you will never seek to amend your Complaint to seek a total amount above \$75,000.

RESPONSE: Denied.

Submitted this the 4th day of August, 2023.

/s/ Lindsey O. Watson
Lindsey O. Watson (MS Bar # 103329)
Charles R. Wilbanks, Jr. (MS Bar #7193)
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CERTIFICATE OF SERVICE

I hereby certify that I have this date, electronically filed a notice of service of the foregoing with the clerk of the Court using the MEC system which will send notification of such filing all counsel of record, and have further served a copy of these responses on all counsel of record via email.

This is the 4th day of August, 2023.

/s/ Lindsey O. Watson
Lindsey O. Watson